

EXHIBIT 2

1 Q. Okay. And you are referring to the -- the
2 other area where you are referring to where, you know,
3 maybe Mr. Croft or Mr. Johnson stopping by is the
4 offices on the ground floor?

5 A. Correct, yeah.

6 Q. Okay. Gotcha. All right.

7 Emergency manager Darnell Earley, did you
8 see him around the plant in early 2014?

9 A. I did not, no.

10 Q. What about Dayne Walling who was the Mayor
11 and also the chairman of the KWA, did you see him
12 around the plant?

13 A. No, I did not.

14 Q. Okay. The day-to-day management of the
15 plant, was that Mike Glasgow's deal?

16 MR. STERN: Objection.

17 BY MR. RINGSTAD:

18 Q. Let me ask a better question.

19 Was Mike Glasgow the one who managed the
20 plant day-to-day?

21 A. Can you clarify "manage," I guess?

22 Q. Yeah. Was Mike Glasgow, in your
23 understanding in 2014, responsible for running the
24 plant daily?

1 MR. STERN: Objection.

2 BY MR. RINGSTAD:

3 Q. You can answer. These objections are
4 interposed. It is just an attorney thing, so.

5 A. Oh, okay.

6 So it was kind of a weird situation
7 because Mike was the F1 holder, so he was responsible
8 for, like, reporting and making sure that, you know,
9 we were meeting all of the regulations, but he wasn't
10 the manager. That was Brent.

11 So, like, Brent would have been
12 responsible for, like, budgetary things, personnel
13 things. So it was kind of -- it was a really weird
14 situation because you don't generally have an F1 not
15 sitting as your head person. So being the lab
16 supervisor, he was making the calls, I guess, for,
17 like, the treatment process, but he really, to my
18 knowledge, really wasn't involved too much with the,
19 like, budgetary stuff. I know he was involved in all
20 of those meetings because he was the F1, but beyond
21 that I don't know how much power he had in those
22 meetings. Like, I -- I wasn't in those meetings with
23 them, so I don't know.

24 Q. Okay.

1 A. If that helps answer that question, I
2 guess.

3 Q. It does. I had the treatment processes in
4 mind, if there were issues with treatment processes,
5 is Mike Glasgow the guy people in the plant would go
6 to?

7 A. Yes, yes.

8 MR. CONNORS: Object to form. Object to form.

9 BY MR. RINGSTAD:

10 Q. Did Mr. Glasgow have hiring and firing
11 authority over plant operators?

12 MR. CONNORS: Objection.

13 BY THE WITNESS:

14 A. No.

15 MR. CONNORS: Lacks foundation.

16 BY MR. RINGSTAD:

17 Q. And you can answer. These objections will
18 come up occasionally.

19 A. Okay. No, no, he did not.

20 Q. Okay. Did he have, to your understanding,
21 the power to decide which treatment processes would be
22 put in place in the plant?

23 MR. CONNORS: Objection, lacks foundation, vague
24 and ambiguous.

1 MR. STERN: Objection.

2 MR. RINGSTAD: Okay. You can just say
3 "objection to form," that's been the case for like
4 three years now. So, and it just makes for a little
5 bit of a cleaner record and a smoother day.

6 An objection by one is of course objection
7 by all for the rules that have been in place forever,
8 so just a reminder to counsel. But you can --

9 MR. STERN: If we can just -- if we can just --
10 if we can just address that for a second.

11 MR. CONNORS: Well, I'm sure that the
12 objection --

13 MR. RINGSTAD: No, let's just move on, Corey.
14 Let's move on.

15 MR. CONNORS: No, you just put a statement on
16 the record. We can respond to your statement on the
17 record.

18 Go ahead, Corey. You can respond. I'll
19 respond as well.

20 MR. RINGSTAD: Okay. Respond. Respond, please.

21 MR. STERN: When -- when --

22 MR. RINGSTAD: Yeah, respond.

23 MR. STERN: When counsel for Veolia claims that
24 an objection for one is an objection for all,

1 insinuating that something inappropriate was done, my
2 understanding is that Mr. Connors is on the West Coast
3 and I am on the East Coast, and I don't have any
4 expertise in telepathy or in mind reading, and so when
5 we simultaneously object, not only does it indicate
6 that it was a poor question because of the mileage
7 between us and our inability to read each other's
8 minds, but it also makes it difficult to know when the
9 other person is going to object.

10 And so, yes, while an objection for one is
11 an objection for all, simultaneous objections can't be
12 helped sometimes, espec- -- especially when a question
13 is asked in such a poor way without foundation.

14 MR. RINGSTAD: Anything else?

15 MR. CONNORS: I'll say we'll -- we'll do our
16 best. It is hard sometimes on Zoom and sometimes we
17 talk over each other.

18 MR. RINGSTAD: That's cool.

19 MR. CONNORS: I understand you to say that if I
20 object to form I have got a broad objection to any
21 part of the question and I'm happy to object that way
22 based on what you said.

23 MR. RINGSTAD: Yeah, that would be great.

24 Thanks. And thanks, Mr. Connors and Mr. Stern.

1 BY MR. RINGSTAD:

2 Q. Let's move on.

3 So, again, to repeat the question, did
4 Mr. Glasgow in 2014 have the power to decide which
5 treatments the water plant was implementing to your
6 understanding?

7 MR. STERN: Objection.

8 MR. CONNORS: Object to form.

9 BY THE WITNESS:

10 A. Yes, I -- I believe so, yes.

11 BY MR. RINGSTAD:

12 Q. Okay. So if a -- if a unit process was
13 desirable, Mr. Glasgow could have implemented it, is
14 that correct?

15 MR. STERN: Objection.

16 MR. CONNORS: Object to form.

17 BY THE WITNESS:

18 A. I don't think he could have just
19 implemented it. It would still have to go through the
20 processes of talking to, you know, Brent and then
21 going up to, like, the director level. It -- it
22 probably would have had a lot to do with cost as well.

23 BY MR. RINGSTAD:

24 Q. Okay. So Mr. Glasgow, to your

1 understanding, could -- he could recommend unit
2 processes to be implemented or treatment changes to be
3 implemented, but there was a budgetary process and
4 there was -- there was higher review that he would
5 need to go through, is that correct?

6 A. Correct.

7 MR. STERN: Objection; form.

8 BY MR. RINGSTAD:

9 Q. All right. So at some point, Nicole, you
10 and the water plant staff learned that Flint was going
11 to stop receiving treated water from the DWSD or I'll
12 just call it Detroit, is that correct?

13 MR. STERN: Objection.

14 BY THE WITNESS:

15 A. Correct.

16 BY MR. RINGSTAD:

17 Q. Okay. When did you first learn that?

18 A. I -- I really don't recall exactly when.

19 Q. Just can you give us a general timeframe
20 when you learned that?

21 A. I mean, we had talked about having the
22 opportunity to do that for years. I really don't
23 recall exactly when. I don't remember if it was the
24 end of 2013 or early 2014. I would -- I guess I

1 MR. STERN: Objection; form.

2 MR. CONNORS: Objection.

3 BY MR. RINGSTAD:

4 Q. Okay. And I think your answer was yes?

5 A. Yes.

6 Q. Okay. And the water plant staff generally
7 understood that any treatment that was implemented had
8 to meet the Michigan Safe Drinking Water Act, is that
9 correct?

10 MR. CONNORS: Objection; form.

11 BY THE WITNESS:

12 A. Correct. Anything we did had to -- was
13 regulated by the Michigan Safe Drinking Water Act.

14 BY MR. RINGSTAD:

15 Q. Okay. And that would include Michigan
16 LCR, Lead and Copper Rule compliance, correct?

17 MR. CONNORS: Objection.

18 BY THE WITNESS:

19 A. Correct.

20 BY MR. RINGSTAD:

21 Q. And one decision that had to be made under
22 the Michigan Lead and Copper Rule for a public water
23 system like Flint's was -- was how to provide
24 corrosion control, is that correct?

1 MR. STERN: Objection to form.

2 MR. CONNORS: Objection.

3 BY THE WITNESS:

4 A. Correct.

5 BY MR. RINGSTAD:

6 Q. And that was the understanding of the --

7 of the water plant staff at the time, correct?

8 MR. CONNORS: Objection; form.

9 BY MR. RINGSTAD:

10 Q. You can answer.

11 A. It depends on the --

12 Q. You can answer.

13 A. It depends on the staff.

14 Q. Okay.

15 A. If you are very familiar with the -- you
16 know, with the regulations, like, I knew that that was
17 required, I'm sure that Mike knew that was required.
18 Would I say that our foreman or some of our operators
19 were under the understanding of that, maybe not. You
20 know, they just dealt with for years and years just
21 distribution pressures. They weren't really, you
22 know, very instrumental in the actual treatment
23 process, so would everybody that worked in the plant
24 think of that, probably not.

1 Q. Okay. That's fair. I appreciate that.

2 You said you're sure that Mike knew that.

3 Why are you sure that Mike knew that?

4 MR. CONNORS: Object to form.

5 BY THE WITNESS:

6 A. Him and I had had conversations about the

7 treatment process.

8 BY MR. RINGSTAD:

9 Q. Okay. And in the conversations about
10 treatment processes, the issue of corrosion control
11 came up?

12 A. Yes.

13 MR. STERN: Objection.

14 BY MR. RINGSTAD:

15 Q. And these were conversations that occurred
16 prior to the -- the switch, so to speak?

17 A. Yes.

18 Q. Okay. And what were you and Mr. Glasgow
19 discussing in those conversations that you can recall
20 specifically?

21 A. About corrosion control?

22 Q. Yeah.

23 A. I just questioned why we hadn't added a
24 phosphate system yet.

1 Q. Okay.

2 And did -- did Mike have an answer for
3 that?

4 A. He did.

5 Q. And what was Mike or Mr. Glasgow's answer?

6 A. His answer was that because we were -- the
7 water coming in from Detroit was not lime softened,
8 right, because the Lake Huron is already within the
9 ppm limit that we were looking for, so we never had
10 to -- they never had to soften for us for that, but
11 the hardness level coming in from the river was so
12 high that we would be using lime softening, so -- and
13 my understanding of this at the time wasn't as good as
14 it is now, obviously, because my roles there and here
15 are completely different, so I've learned a lot being
16 here, so now I understand more now what I didn't
17 understand then.

18 Q. Sure.

19 A. So the explanation that I recall, and this
20 may not be verbatim because this was almost ten years
21 ago, was that because we were adding lime now that we
22 had, like, a little bit of a buffer because the lime
23 should adhere to what we had in the phosphate already
24 in the -- in the system to create a layer, like a

1 crusty layer, so that way we had some time to get the
2 phosphate system in place, you know, before -- before
3 Karegnondi got in. So we had some time in that
4 timeframe because of the lime softening.

5 So that was supposed to help. And my
6 understanding is that's what he was told by DEQ in --
7 in their meetings and stuff when they were starting to
8 ramp up.

9 Q. Okay. So -- and I appreciate the -- the
10 comment that you made about, you know, what you know
11 now versus what you knew then. What's helpful to us,
12 as best you can recall what Mr. Glasgow told you, if
13 it's not verbatim, indicate that, I think you did, and
14 also what your understanding was at the time.

15 A. Correct.

16 Q. So let me circle back to -- to your
17 testimony a little bit.

18 Am I understanding correctly that
19 Mr. Glasgow's explanation why phosphates would not be
20 added to Flint River water was that there were
21 existing phosphate scales in the system over which
22 carbonate deposition layer could be put because the
23 Flint River water was hard, is that correct?

24 MR. STERN: Objection.

1 BY THE WITNESS:

2 A. Well, the lime -- the lime softening
3 process would, yes, because of the -- that portion of
4 the process, but Mr. Glasgow was also uncomfortable
5 with that explanation. That wasn't something he was
6 very comfortable with either. So that's why it became
7 a conversation between the two of us.

8 BY MR. RINGSTAD:

9 Q. So is it correct to say that Mr. Glasgow
10 conveyed to you that lime softening would be corrosion
11 control for Flint using the Flint River water?

12 MR. CONNORS: Objection.

13 BY THE WITNESS:

14 A. I wouldn't say that he -- he conveyed it
15 as a corrosion control. I think it was conveyed to
16 him that it was, like, it could help until we could
17 get corrosion control.

18 BY MR. RINGSTAD:

19 Q. Okay. So the idea was to use that
20 strategy to get to the KWA water, is that right?

21 MR. STERN: Objection.

22 BY THE WITNESS:

23 A. Not necessarily all of the way to KWA,
24 but, like, we had some time between that and KWA to

1 get that done. So I think the idea was that at some
2 point in those two years we get that system up and
3 running and get it moving before we ever got to KWA,
4 because obviously from the understanding I had then,
5 and this is my understanding of the conversation, was
6 that --

7 BY MR. RINGSTAD:

8 Q. Sure.

9 A. -- because KWA water was Lake Huron water
10 there would be no softening, and then so we would not
11 have that kind of buffer, I guess, anymore. So it
12 wasn't, like, we could wait until it came in, but it
13 was, like, we have a little bit of time to get that in
14 between now and then, I guess.

15 Q. Okay. The plan was to eventually install
16 a phosphate feed though, is that right?

17 A. Yes. Yes.

18 MR. CONNORS: Objection.

19 MR. STERN: Objection. We -- we -- if it's
20 possible to be able to just have a moment before the
21 answer so that if we have an objection we can place it
22 on the record, we would very much appreciate it.

23 MR. RINGSTAD: Sure, yeah.

24 BY MR. RINGSTAD:

1 Q. And -- and, Nicole, just to be clear,
2 painfully clear, that's a request to you. I'll try to
3 make for a clean ending to the question and if you can
4 just give a little pause, especially in light of
5 the -- the technical issues that we have had this
6 morning.

7 A. Okay.

8 Q. That would be appreciated by all,
9 especially the court reporter, I'm sure.

10 Okay. So let me -- let me get back to
11 that question.

12 The -- the plan, as you understood it from
13 talking to Mr. Glasgow, was that eventually phosphate
14 feed would be implemented for the City?

15 MR. CONNORS: Objection.

16 BY THE WITNESS:

17 A. Yes, correct.

18 BY MR. RINGSTAD:

19 Q. Okay. And did I understand correctly that
20 that phosphate feed may have -- well, the plan was not
21 specific, let's put it this way, about whether that
22 phosphate feed would be for treating Flint River water
23 or for KWA or Lake Huron water, is that correct?

24 MR. STERN: Objection.

1 BY THE WITNESS:

2 A. At that time I don't think that they had a
3 plan in place of exactly when, no.

4 BY MR. RINGSTAD:

5 Q. Okay. So it -- it could be that the
6 phosphate feed would be implemented in a year, in
7 which case it would likely be for Flint River water,
8 or it would be implemented in three years or two
9 years, in which case it would likely be for KWA water,
10 is that what you are saying?

11 MR. STERN: Objection.

12 MR. CONNORS: Objection.

13 BY THE WITNESS:

14 A. The conversations we had were before we
15 ever started running the plant. I don't know what the
16 actual plans were moving forward. These were just my
17 concerns that I brought to him and my questioning to
18 him.

19 BY MR. RINGSTAD:

20 Q. Okay.

21 A. After that, we really never talked about,
22 like, when that system was going to be added, so I
23 have no idea, like, when that was going to possibly be
24 added or what they had planned in any of their --

1 their meetings with the administrators, the directors,
2 you know, things like that. That was just me
3 questioning him when we -- when -- before we actually
4 started running.

5 Q. But you were aware from talking to
6 Mr. Glasgow that there was a plan for phosphate feed,
7 correct?

8 MR. STERN: Objection.

9 BY THE WITNESS:

10 A. Correct, yes.

11 BY MR. RINGSTAD:

12 Q. And the plant staff, just generally
13 speaking, understood what it would take to implement
14 the phosphate feed, just in terms of the pumps and
15 chemical storage and that kind of thing, is that -- is
16 that fair?

17 MR. CONNORS: Objection.

18 MR. STERN: Objection.

19 BY THE WITNESS:

20 A. I would say it would be fair if you're
21 talking about, like -- like uppers. I don't know how
22 much attention the rest of the plant really paid to
23 that kind of stuff.

24 BY MR. RINGSTAD:

1 Q. Okay. Got it.

2 And in 2014, early 2 -- 2014, was it your
3 understanding that phosphate feed would be
4 specifically for corrosion control?

5 MR. CONNORS: Objection.

6 MR. STERN: Objection.

7 BY THE WITNESS:

8 A. Yes.

9 BY MR. RINGSTAD:

10 Q. Okay. And was that Mr. Glasgow's
11 understanding as far as you could tell?

12 MR. STERN: Objection.

13 BY THE WITNESS:

14 A. I would assume, yes.

15 BY MR. RINGSTAD:

16 Q. Okay. And at that point, this is before
17 the switch to the Flint River, incoming Detroit water
18 was treated with phosphates, correct?

19 A. Correct.

20 Q. Okay. And Mr. Glasgow, maybe others, were
21 tracking and monitoring phosphate levels for the City
22 of Flint, is that correct?

23 MR. STERN: Objection.

24 BY THE WITNESS:

1 A. That -- yes, I did the testing for the
2 phosphates.

3 BY MR. RINGSTAD:

4 Q. You did the testing for the phosphates,
5 okay.

6 A. Yes, I did.

7 Q. Okay. So, and that was -- was that a
8 daily test that you did for phosphate levels for
9 incoming Detroit water?

10 A. No. Water quality monitoring for us, if I
11 remember correctly, was a quarterly.

12 Q. Okay.

13 A. Prior to running the Flint River. That --
14 all of our sampling requirements changed when -- when
15 our water changed.

16 Q. Okay. All right.

17 And those -- those phosphate records
18 were -- were kept at the plant, is that correct?

19 A. Yes.

20 Q. Okay.

21 A. And they should -- and I believe they were
22 sent to the DEQ as well.

23 Q. Okay. All right.

24 From your earlier comments, I gathered

1 that the water plant staff was aware that the use of
2 phosphates by Detroit water over the years would lead
3 to the development of phosphate based scales within
4 the distribution system.

5 Is that fair to say?

6 MR. CONNORS: Objection.

7 BY THE WITNESS:

8 A. I would hope so because they were
9 licensed, but I -- I wouldn't know for sure that the
10 rest of the plant had an understanding of that.

11 BY MR. RINGSTAD:

12 Q. Right. Were you aware of that in 2014?

13 A. I was, yes.

14 MR. CONNORS: Objection.

15 BY MR. RINGSTAD:

16 Q. Okay. Was Mr. Glasgow aware of it, to
17 your knowledge, it sounds like he was based on what
18 you said, but I just want to see what you have to say
19 about that?

20 MR. CONNORS: Objection.

21 MR. STERN: Object to form, move to strike.

22 BY MR. RINGSTAD:

23 Q. You can answer.

24 A. Yes, I would believe so, yes.

1 Q. Okay. Other than the conversation that
2 you had with Mr. Glasgow where he, you know,
3 referenced the -- the mechanism by which corrosion
4 would be controlled, the overlay of carbonates on top
5 of phosphate scales, did you ever hear Mr. Glasgow
6 talk about, you know, phosphate-based scales or scale
7 formation in the distribution system in that time
8 period, 2014?

9 MR. STERN: Object to form.

10 BY THE WITNESS:

11 A. No.

12 MR. STERN: Move to strike.

13 BY THE WITNESS:

14 A. No, I did not.

15 MR. RINGSTAD: And, Counsel, this is a discovery
16 deposition, I mean, by all indications, so I don't
17 know that motions to strike are going to get you
18 anywhere, but that's okay.

19 MR. STERN: Move to strike.

20 MR. CONNORS: And just to clarify, when you say
21 "this is a discovery deposition," what -- what are you
22 saying exactly about the deposition?

23 MR. RINGSTAD: Jordan, let's just -- just --
24 let's move on with the deposition, okay?

1 A. I assumed so, yes.

2 Q. Okay. And why did you assume so?

3 A. Because I knew that was part of water
4 treatment. It was a test that I did on a regular --
5 you know, a regular quarterly basis, so I knew it was
6 important.

7 Q. Okay. So was that -- did that have
8 anything to do with the fact that Detroit had fed
9 phosphates or supplied water treatment with phosphates
10 over the years to Flint?

11 A. Yes, and I also understood the Lead and
12 Copper Rule, so I understand what phosphate was for.

13 Q. And your -- your expectation didn't have
14 anything -- or didn't have any basis, I should say, in
15 any -- any engineering studies or corrosion control
16 studies or anything like that, is that fair?

17 A. Yeah, that's fair. No, just from my
18 knowledge of Safe Drinking Water Act and my testing
19 background, really.

20 Q. Okay. All right. I think you indicated
21 that the MDEQ communicated to water plant staff at
22 some point that the phosphate addition would not be
23 required for Flint, is that -- is that correct?

24 A. No, I don't know that they indicated that

1 it would not be required for Flint.

2 Q. Okay.

3 A. From me and Mike's conversation it was
4 more you have a little bit of a buffer of a time, and
5 when I asked him where he got that from, my
6 recollection is that somebody told him he had a little
7 bit of time. Never did I say that they just said we
8 didn't have to.

9 Q. Okay. Okay. So your understanding of
10 what MDEQ had communicated was that it was not --
11 phosphates were not immediately required for Flint?

12 MR. STERN: Objection.

13 BY MR. RINGSTAD:

14 Q. Is that correct?

15 A. Yeah, from my understanding.

16 Q. Okay.

17 A. I don't know that he used those words
18 exactly, but from -- that was the understanding I
19 gathered from our conversation.

20 Q. Okay. That's how you understood it at the
21 time.

22 Did you ever see any regulatory
23 communications from MDEQ regarding phosphates or lack
24 of phosphates for Flint? Do you recall anything like

1 off on annual. About your inquiry of the effect of
2 treated flint river water on the distribution system,
3 I have heard different arguments. Personally, I don't
4 believe it will have much effect. It all depends on
5 our final water quality (mostly pH and alkalinity).
6 Most likely we will have scale-forming water, and this
7 may lead to lots of scale build up in the system."

8 And it goes on from there.

9 Do you see that?

10 A. I do.

11 Q. Do you recall having conversations with
12 Mr. Glasgow in late 2013 or early 2014 that he
13 believed that the water in the City of Flint would be
14 scale forming?

15 MR. STERN: Objection.

16 BY THE WITNESS:

17 A. I kind of -- I believe that goes back to
18 his and I conversation I referenced earlier in our
19 conversations when I asked him why we weren't adding
20 phosphate and he talked to me about, you know, lime
21 softening and how that would create a scale.

22 So this kind of follows up with those
23 conversations -- that conversation him and I had with
24 that because that was kind of where the mindset was.

1 BY MR. ERICKSON:

2 Q. And based on your conversations with
3 Mr. Glasgow and your own understanding, did you
4 understand that in order for the water to be -- to be
5 scale forming, that the City would have to be doing
6 lime softening?

7 A. Yes.

8 MR. STERN: Objection. I'd like a standing
9 objection as to any questions that would involve
10 expert testimony.

11 MR. ERICKSON: I -- I don't have a problem with
12 the standing objection, but I just want to note that I
13 was just asking her for her understanding.

14 MR. STERN: I hear you. Experts have a lot of
15 understandings.

16 BY MR. ERICKSON:

17 Q. Do you recall having any conversations
18 with Mr. Glasgow at any time in 2013 or 2014 about a
19 concern that the use of phosphates may, quote, lead to
20 lots of scale buildup in the system?

21 A. The use of phosphates, no, I never had a
22 conversation like that.

23 Q. The next sentence, which I didn't read
24 before, goes on to say:

1 Mr. Rosenthal, he says that the City doesn't have to
2 monitor because they are not using phosphates,
3 correct?

4 A. That's what I'm reading, yes.

5 Q. Okay. Earlier today I showed you an
6 exhibit from March of 2014 where Mr. Glasgow stated to
7 Mr. Hill that he was planning to use phosphates
8 corrosion -- for corrosion control.

9 Do you remember that?

10 A. Yep.

11 Q. Do you know what changed between March 26
12 and mid-June of 2014?

13 MR. STERN: Objection; misstates testimony, it's
14 not the full picture.

15 Phil, there was trial testimony about
16 this. Are you going to show her his trial testimony?

17 MR. ERICKSON: Object to the speaking objection
18 and move to strike.

19 BY MR. ERICKSON:

20 Q. Do you understand the question,
21 Ms. Alexander?

22 A. You are basically asking me at what point
23 did Mike decide that we were adding phosphate?

24 Q. My question is: Do you know what changed

1 between Mr. Glasgow's e-mail in March, late March
2 of 2014 and this e-mail in mid-June of 2014?

3 MR. STERN: I object to the entire line of
4 questioning. It misstates testimony, it assumes facts
5 that are not just -- it assumes facts contrary to the
6 evidence.

7 MR. CONNORS: I join and I object to lack of
8 foundation.

9 BY MR. ERICKSON:

10 Q. Ms. Alexander, do you understand the
11 question?

12 A. You are basically asking me what changed
13 from his e-mail that he sent with his concerns or the
14 e-mail he sent to Mr. Hill saying that phosphates
15 would be added, to this e-mail stating that there is
16 no phosphates added, correct?

17 Q. Correct, the latter -- the last thing you
18 said is what I intend to ask.

19 A. Okay. Right.

20 MR. CONNORS: Same objections.

21 BY THE WITNESS:

22 A. And again, there was never anything that
23 said that we were not ever going to add phosphates
24 again. We had a delay and we knew that the phosphate

1 system had to be in at some point before Karegnondi
2 because Karegnondi water would not be softened so
3 Karegnondi water would not have the same scaling
4 effect our Flint River water would have.

5 And as I stated earlier, I don't know what
6 the timeframe that was given to us or suggested would
7 be for that to happen. So this is only a few months
8 after we started, so at that point obviously we were
9 not adding it yet, but I don't know when that
10 timeframe was that we were given to have to have it
11 in. So if it's not there, you know, I just knew
12 before Karegnondi.

13 Q. All right. I --

14 MR. ERICKSON: Well, you can go ahead and take
15 this exhibit down. I'm almost done. I have a few
16 more questions.

17 In -- well, you know what, let's put up
18 what was previously marked as Johnson 88. It is an
19 e-mail from February of 2015.

20 (WHEREUPON, a certain document was
21 marked Nicole Alexander Deposition
22 Exhibit No. 16, for identification,
23 as of 10/27/2022.)

24 BY MR. ERICKSON: